

# EXHIBIT 11



## FEDERAL BUREAU OF INVESTIGATION

Date of entry 09/04/2025

PAUL BROOKES, previously identified, was interviewed via Microsoft Teams. Participating in the interview was FBI Special Agent Jeffrey Weeks and DOJ representatives Andrew Tyler and Vasanth Sridharan. After being advised of the identities of the interview participants and the nature of the interview, BROOKES provided the following information:

[Investigator note: Prior to the interview, BROOKES was provided a copy of a document entitled "Defendant's motion in limine to exclude expert testimony of Paul Brookes, Ph.D".]

BROOKES notes that the above-listed motion stated BROOKES' expertise is in cardiac rather than neuronal research. In fact, BROOKES did his post-doctoral fellowship at the University of London's Institute of Neurology.

BROOKES has been a co-Primary Investigator on an NIH grant related to Huntington's Disease. BROOKES is also listed on a pending NIH grant application which relates to Traumatic Brain Injury.

BROOKES notes that the above-listed motion stated BROOKES has no experience working on scientific research with private industry. In fact, BROOKES has worked with several private companies as a scientific consultant to include a Danish company called Neurosearch AS.

BROOKES, together with a biotech company called LUMINOVA, recently received a grant from NIH to perform research in BROOKES' lab.

BROOKES notes that the above-listed motion stated BROOKES' work in the field of scientific misconduct has never led to successful civil lawsuits or criminal prosecutions. BROOKES is aware of several cases in which evidence he provided to NIH's Office of Research Integrity ("ORI") was used by ORI and resulted in ORI sanctions.

BROOKES notes that the above-listed motion quotes BROOKES as rejecting "fully 50% of the manuscripts [he] receive[s] to review because they contain manipulated data or other signs of misconduct."

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Investigation on 09/02/2025 at Manassas, Virginia, United States (Other (Microsoft Teams))

File # 318D-WF-3481291-BROOKES Date drafted 09/02/2025

by Jeffrey Weeks

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BROOKES reviews manuscripts for 20-30 different journals. BROOKES knows that some of these journal editors send things to BROOKES that seem dodgy because those editors know about BROOKES' expertise in the identification of fraudulent scientific imagery. BROOKES has been told on a number of occasions by journal editors that he was selected to review a manuscript based on his focus and expertise in fraudulent imagery.

BROOKES notes that the above-listed motion stated BROOKES has published two papers in the area of "scientific sleuthing". The most recent paper BROOKES published on scientific fraud came about as a result of his participation in a conference in which he was an invited speaker. The conference published a collection of papers written by the conference speakers related to the subjects of their presentations.

BROOKES notes he has been invited to speak at the upcoming annual conference of the Association of Research Integrity Officers. BROOKES' topic is "how do scientific sleuths work with institutions", and he will speak on a panel related to that subject.

BROOKES notes that the above-listed motion stated BROOKES' analysis of images has not employed a scientific process. In fact, in several of the analytical products BROOKES prepared he used ORI droplets, which are scientifically-recognized processes for evaluating imagery.

In BROOKES' report which made use of terminal digit analysis, BROOKES used a statistical test of the results and referenced the scientific paper which described terminal digit analysis.

BROOKES notes that the above-listed motion stated BROOKES' methods have not been generally accepted in the scientific community. BROOKES notes that the analysis of fraudulent scientific imagery is a new and unusual thing and no degree exists related to the analysis and identification of scientific fraud.

Western blotting is used in so many areas of scientific research because it is a universally applied method. BROOKES has been involved with thousands of western blots going back several decades. To this day, BROOKES still prepares western blots in his lab and supervises the preparation of western blots. BROOKES also reviews dozens of scientific manuscripts per year, many of which contain western blots.

BROOKES notes that the above-listed motion stated BROOKES "cannot rule out that certain of Dr. Wang's relevant images may be missing, but he persists in his analysis, nonetheless." BROOKES analyzed images provided to him by Special Agent Weeks, but he also reviewed a large database of images

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associated with Dr. Wang for relevant or related images.

BROOKES notes that the above-listed motion stated BROOKES has emphasized that his work in scientific sleuthing is conducted outside the boundaries of his job and as a private citizen. BROOKES notes that he is legally required to provide that disclaimer in order to remove liability from his employer.

BROOKES will endeavor to find and forward to the interviewing Agent a peer-reviewed article which lays out standards of image analysis.

BROOKES notes that he contributed data to the author of an article in the journal *Sila* related to a system for scientific image analysis.

[Investigator note: Following the conclusion of the interview, BROOKES sent the attached email entitled "papers etc." to SA Weeks.]